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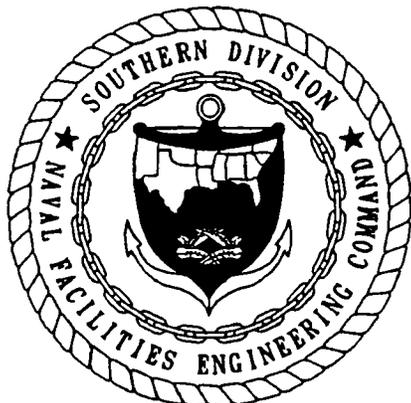
CORRECTIVE ACTION MANAGEMENT PLAN NSA PANAMA CITY FL
5/1/1994
ABB ENVIRONMENTAL SERVICES



CORRECTIVE ACTION MANAGEMENT PLAN

**COASTAL SYSTEMS STATION
PANAMA CITY, FLORIDA**

MAY 1994



**SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
NORTH CHARLESTON, SOUTH CAROLINA
29419-9010**

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PRIOR NOTIFICATION OF THE COMMANDING OFFICER OF
COASTAL SYSTEMS STATION, PANAMA CITY**

CORRECTIVE ACTION MANAGEMENT PLAN

**COASTAL SYSTEMS STATION
PANAMA CITY, FLORIDA**

EPA ID No. FL8 170 002 792

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MAY 1994

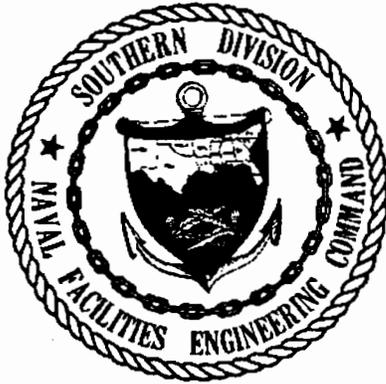
DISTRIBUTION

SOUTHNAVFACENGCOM	2
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USEPA Region IV	2
Florida Department of Environmental Protection	2

Unclassified

SECURITY CLASSIFICATION OF THIS PAGE

REPORT DOCUMENTATION PAGE				Form Approved OMB No. 0704-0188	
1a. REPORT SECURITY CLASSIFICATION Unclassified		1b. RESTRICTIVE MARKINGS N/A			
2a. SECURITY CLASSIFICATION AUTHORITY N/A		3. DISTRIBUTION/AVAILABILITY OF REPORT N/A			
2b. DECLASSIFICATION/DOWNGRADING SCHEDULE N/A					
4. PERFORMING ORGANIZATION REPORT NUMBER(S)		5. MONITORING ORGANIZATION REPORT NUMBER(S) N/A			
6a. NAME OF PERFORMING ORGANIZATION ABB Environmental Services, Inc.		6b. OFFICE SYMBOL (if applicable) ABB-ES		7a. NAME OF MONITORING ORGANIZATION Coastal Systems Station, Panama City, FL	
6c. ADDRESS (City, State, and ZIP Code) 2590 Executive Center Circle East Tallahassee, FL 32303		7b. ADDRESS (City, State, and ZIP Code) Coastal Systems Station Code 3610 AM Panama City, FL 32407-5000			
8a. NAME OF FUNDING/SPONSORING ORGANIZATION SOUTHNAVFACENGCOM		8b. OFFICE SYMBOL (if applicable) N/A		9. PROCUREMENT INSTRUMENT IDENTIFICATION NUMBER N62467-89-D-0317	
8c. ADDRESS (City, State, and ZIP Code) Commanding Officer SOUTHNAVFACENGCOM P.O. Box 190010 North Charleston, SC 29419-9010		10. SOURCE OF FUNDING NUMBERS			
		PROGRAM ELEMENT NO.	PROJECT NO.	TASK NO.	WORK UNIT ACCESSION NO.
11. TITLE (Include Security Classification) Corrective Action Management Plan, Coastal Systems Station, Panama City, FL					
12. PERSONAL AUTHOR(S)					
13a. TYPE OF REPORT Draft	13b. TIME COVERED FROM April 1991 TO May 1994	14. DATE OF REPORT (Year, Month, Day) May 1994	15. PAGE COUNT 26		
16. SUPPLEMENTARY NOTATION None					
17. COSAT: CODES			18. SUBJECT TERMS (Continue on reverse if necessary and identify by block number) RCRA, RCRA Facility Investigation, RCRA Facility Assessment, Corrective Measures Study, SWMU, AOC, Corrective Action Plan.		
FIELD	GROUP	SUB-GROUP			
19. ABSTRACT (Continue on reverse if necessary and identify by block number) This Corrective Action Management Plan (CAMP) for CSS Panama City provides the overall management structure for implementing the Corrective Action Program (CAP) at the facility. The CAMP includes a list of known Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs), the strategy to implement the CAP, and the schedule for CAP activities.					
20. DISTRIBUTION/AVAILABILITY OF ABSTRACT <input type="checkbox"/> Unclassified/Unlimited <input checked="" type="checkbox"/> Same as RPT <input type="checkbox"/> DTIC Users			21. ABSTRACT SECURITY CLASSIFICATION Unclassified		
22a. NAME OF RESPONSIBLE INDIVIDUAL Sid Allison		22b. TELEPHONE (Include Area Code) (803)743-0600		22c. OFFICE SYMBOL Code 18	



FOREWORD

The Department of the Navy developed the Installation Restoration (IR) Program to locate, identify, and remediate environmental contamination from the past disposal of hazardous materials at U.S. Navy installations. The Navy IR Program follows the Department of Defense's Defense Environmental Restoration Program (DERP) as mandated by the Superfund Amendments and Reauthorization Act (SARA) of 1986.

Prior to securing a RCRA Part B permit, the IR Program at Coastal Systems Station Panama City, Florida consisted of two phases. Phase One consisted of the Initial Assessment Study (IAS) to identify the location (site) and presence of pollutants and assess their potential or actual threat to human health and the environment. Phase Two consisted of the Verification/Confirmation Study which was conducted to initially assess the nature and extent of contamination at the facility.

Since the completion of Phase Two, CSS Panama City has obtained a Resource Conservation and Recovery Act (RCRA) Part B Permit, in accordance with the Hazardous and Solid Waste Amendments of 1984, from the U.S. Environmental Protection Agency (USEPA) Region IV. While operating under this permit, and through the IR Program, the Navy has initiated additional investigative studies. A RCRA Facility Assessment (RFA) was completed in October of 1987 that identified Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). After completion of the RFA, a Phase 1 RCRA Facility Investigation (RFI) was conducted to assess the nature and extent of contamination at the SWMUs and AOCs. Currently, the Navy is completing the RFI by addressing data gaps determined during Phase 1, initiating investigations at other SWMUs where appropriate, and intends to implement a Corrective Measures Study (CMS) for SWMUs and AOCs where the degree of threat to human health and the environment requires remediation.

The Corrective Action Management Plan (CAMP) for CSS Panama City provides the overall management structure for implementing the Corrective Action Program (CAP) at the facility. The CAMP includes a list of known SWMUs and AOCs, the strategy to implement the CAP, and the schedule for CAP activities. The CAP delineates the responsibility and authority of all parties, the roles and qualifications of key personnel, and the plan for community relations.

Southern Division, Naval Facilities Engineering Command (SOUTHNAVFACENGCOM) has assisted CSS Panama City in preparing this CAMP. Questions regarding this report should be addressed to the Commanding Officer, Coastal Systems Station, Panama City, Florida.

EXECUTIVE SUMMARY

This Corrective Action Management Plan (CAMP) documents the proposed schedule and activities for implementation of corrective action at Coastal Systems Station (CSS) Panama City, Florida. This report has been completed by ABB Environmental Services, Inc. (ABB-ES) for Southern Division, Naval Facilities Engineering Command (SOUTHNAVFACENGCOM) under Contract Number N62467-89-D-0317.

An Initial Assessment Study (IAS) and a Verification/Confirmation Study (VS/CS) were completed at CSS Panama City under the Installation Restoration (IR) Program before the facility obtained a Resource Conservation and Recovery Act (RCRA) Part B permit. Since receipt of that permit, a RCRA Facility Assessment (RFA) and a Phase 1 RCRA Facility Investigation (RFI) have been completed at CSS Panama City.

This CAMP proposes a schedule of activities (Section 5) that begin with the Phase 2 RFI and Corrective Measures Study (CMS). A total of 15 sites were identified during the RFA, and of these, ten SWMUs/AOCs are included in the 1994 CAMP for investigation/corrective action. Where appropriate, a No Further Action (NFA) decision will be made and no corrective action will be necessary.

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Coastal Systems Station, Panama City, Florida

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GLOSSARY OF ACRONYMS AND ABBREVIATIONS

ABB-ES	ABB Environmental Services, Inc.
AOC	Area of Concern
CAMP	Corrective Action Management Plan
CAP	Corrective Action Program
CMI	Corrective Measures Implementation
CMS	Corrective Measures Study
CSS	Coastal Systems Station
DoD	Department of Defense
DERP	Defense Environmental Restoration Program
HEA	Health and Environmental Assessment
IAS	Initial Assessment Study
IM	Interim Measures
IR	Installation Restoration
IRM	Interim Remedial Measures
NFA	No Further Action
NIRP	Naval Installation Restoration Program
RCRA	Resource Conservation and Recovery Act
RFA	RCRA Facility Assessment
RFI	RCRA Facility Investigation
SARA	Superfund Amendments and Reauthorization Act
SOUTHNAVFACENCOM	Southern Division, Naval Facilities Engineering Command
SWMU	Solid Waste Management Unit
USEPA	U.S. Environmental Protection Agency
VS/CS	Verification Study/Confirmation Study

1.0 INTRODUCTION

This Corrective Action Management Plan (CAMP) provides the overall management structure for implementing the Corrective Action Program (CAP) at Coastal Systems Station (CSS) Panama City, Florida. This CAMP includes a list of known Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) currently under investigation, the strategy to implement the CAP, and the schedule for CAP activities.

The remainder of this plan is organized as follows: Section 2.0 provides the goals, objectives, and assumptions of the CAP for CSS Panama City. Section 3.0 provides a summary of the implementation of corrective action initiatives at CSS Panama City to date, and Section 4.0 outlines the proposed strategy for the continued implementation of corrective action initiatives. Section 5.0 presents a schedule for various stages of the CAP.

2.0 GOALS AND OBJECTIVES

The purpose of the CAMP is to outline the proposed strategy to achieve the goals and objectives of the Resource Conservation and Recovery Act (RCRA) CAP at CSS Panama City, Florida. A decision flow chart for corrective action is presented on Figure 2-1. This section discusses the goals, objectives, and assumptions of the implementation of the RCRA CAP at CSS Panama City.

2.1 GOALS. The goals of the RCRA CAP are to eliminate releases from SWMUs and AOCs that pose a threat to human health and the environment and to remediate contaminated media to a level consistent with current use of the SWMUs or AOCs (USEPA, 1988).

2.2 OBJECTIVES. The goals outlined in the previous subsection are being achieved by accomplishing the following objectives in the order presented and in accordance with the RCRA Permit (USEPA I.D. No FL8 170 002 792) dated December 6, 1985 (Appendix A):

- o Complete a RCRA Facility Assessment (RFA) at suspected SWMUs and AOCs to confirm releases to the environment in accordance with Section II.A.1 of the RCRA permit;
- o Complete a RCRA Facility Investigation (RFI) at SWMUs and AOCs with confirmed releases to the environment in accordance with Sections II.A.2, 3, 4, and 5 of the RCRA permit;
- o Complete a Health and Environmental Assessment (HEA) to accomplish the following objectives:
 - define the hazards and risks to human health and the environment associated with confirmed releases of hazardous substances, and
 - assess the need for interim measures (IM) and/or corrective measures depending on the degree of threat to human health and the

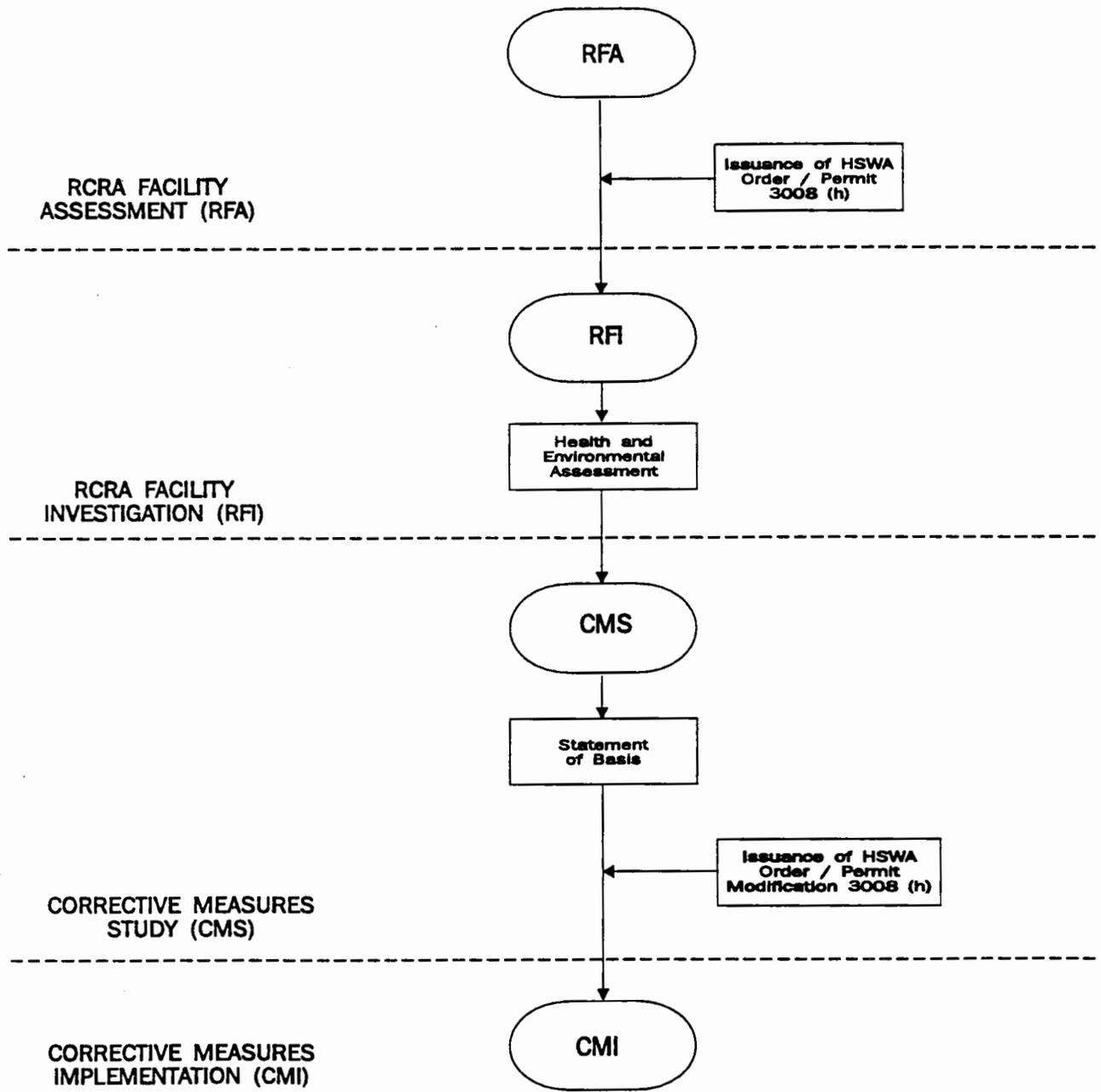


FIGURE 2-1
DECISION FLOW CHART



**CORRECTIVE ACTION
MANAGEMENT PLAN**
**COASTAL SYSTEMS STATION
PANAMA CITY, FLORIDA**

environment.

- o Complete a Corrective Measures Study (CMS) for SWMUs and AOCs where future response actions are required and identify an appropriate remedial alternative for each SWMU or AOC.

2.3 ASSUMPTIONS. To achieve the goals and objectives presented in the previous subsections, the following assumptions have been made:

- o RFA, RFI, and CMS activities, such as work plan development, field implementation, laboratory analysis, and reporting of the findings, are completed in multiple independent phases.
- o Implementation of RFI/CMS activities may occur simultaneously at appropriate SWMUs and AOCs where the need for corrective measures is identified early in the process.
- o The implementation of the RFA, RFI, or CMS at individual SWMUs or AOCs is defined by the estimated site-specific risk to human health and the environment. Perceived "high" risk SWMUs and AOCs will be given priority and will be addressed via an RFI or CMS earlier than perceived "low" risk SWMUs and AOCs.
- o Further RFI activities may be required in order to identify the need for corrective measures where release characterization is incomplete and potential risk to human health and environment is uncertain.
- o Interim Remedial Measures (IRM) may be implemented at any SWMU or AOC prior to completion of the Corrective Measures Implementation (CMI), if warranted.

3.0 LIST OF KNOWN SOLID WASTE MANAGEMENT UNITS AT COASTAL SYSTEMS STATION.

PANAMA CITY

The Department of the Navy developed the Installation Restoration (IR) Program to locate, identify, and remediate environmental contamination from the past disposal of hazardous materials at U.S. Navy installations. The Navy IR Program follows the Department of Defense's (DoD) Defense Environmental Restoration Program (DERP) as mandated by the Superfund Amendments and Reauthorization Act (SARA) of 1986.

The IR Program at CSS Panama City consisted of two phases. Phase One consisted of the Initial Assessment Study (IAS) to identify the location (site) and presence of pollutants and to assess their potential or actual threat to public health and the environment (C.C. Johnson & Associates, 1985). This study identified eight sites and recommended no further action (NFA) for one site and confirmation studies for seven sites. Phase Two consisted of the Verification Study/Confirmation Study (VS/CS) that was completed to initially assess the nature and extent of contamination at the seven sites (Environmental Science and Engineering, 1987). The VS/CS recommended NFA or corrective action for four sites and remedial measures for three sites (Table 3-1, page 3-4).

Since the completion of Phase Two (or the VS/CS), CSS Panama City was issued a RCRA Part B Permit, in accordance with the requirements of the Hazardous and Solid Waste Amendments of 1984, Public Law 98-616, on December 6, 1985. Corrective action initiatives were subsequently enforced under this authority through the Navy IR Program:

- o An RFA was completed by E.C. Jordan Co. in 1987. The purpose of this study was to identify SWMUs and AOCs at CSS Panama City; this study identified twelve SWMUs and three AOCs as areas with suspected releases of hazardous waste (all eight sites from the IR Program Phase One and seven new sites were identified). Upon further evaluation of data obtained through earlier studies (i.e., the VS/CS), the RFA recommended five SWMUs and one AOC for NFA, and seven SWMUs and two AOCs for continued corrective actions.

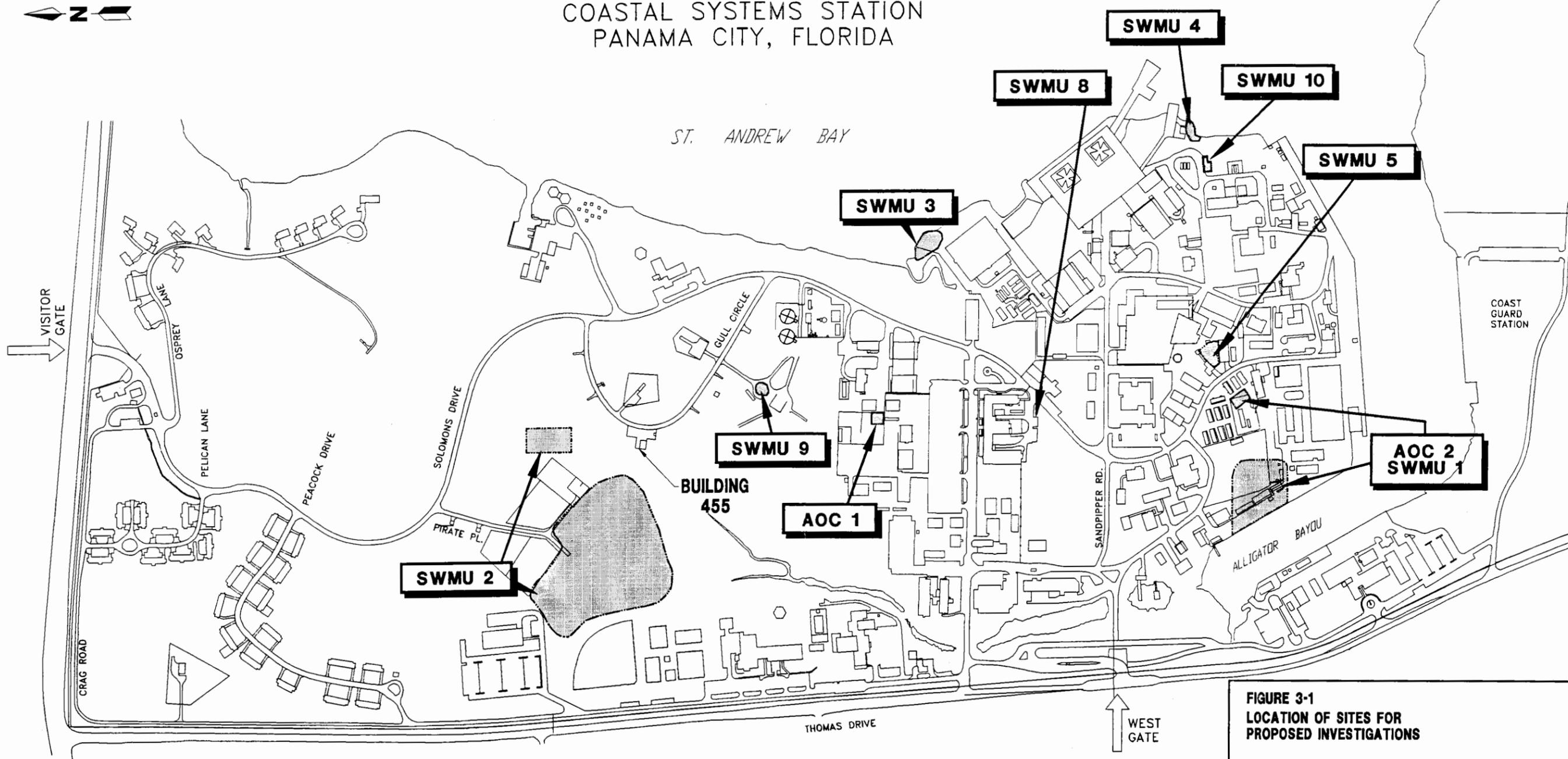
- o A Phase 1 RFI was completed by ABB-ES in June, 1992 at the seven SWMUs and 2 AOCs recommended for continued corrective actions during the RFA. This study was completed to characterize the nature and extent of contamination and assess the risk to human health and the environment.
- o A preliminary HEA was completed for the Phase 1 RFI, and it was determined that no threat to human health or the environment exists at SWMU 8. At the remaining six SWMUs and two AOCs, characterization of contamination is incomplete and data gaps were identified while preparing the HEA.
- o Based on the conclusions of the Phase 1 RFI and the HEA, a Phase 2 RFI program was planned and is currently ongoing. This program is intended to fulfill the needs of the HEA and collect additional information necessary to define the nature and extent of contamination at the six SWMUs and two AOCs for which a Phase 1 RFI was completed. Two additional areas of investigation were also added to the Phase 2 RFI: SWMU 10 and the Building 455 site. SWMU 10 was recommended for NFA upon completion of the RFA; however, chlorinated solvents were detected in groundwater samples collected from the SWMU during investigations conducted under the Underground Storage Tank Program and the SWMU was subsequently delegated to the Phase 2 RFI Program for further investigation. The Building 455 site was added to the Phase 2 RFI because of the use of methylene chloride at the site.

Table 3-1 provides a summary of these previous studies completed at CSS Panama City. This table lists the sites identified in these previous studies and indicates which sites were recommended for further investigation and which sites were recommended for no further action. Figure 3-1 shows the location of the sites currently being investigated at CSS Panama City.



COASTAL SYSTEMS STATION PANAMA CITY, FLORIDA

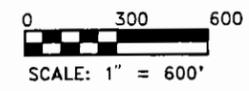
ST. ANDREW BAY



**FIGURE 3-1
LOCATION OF SITES FOR
PROPOSED INVESTIGATIONS**



**CORRECTIVE ACTION
MEASUREMENT PLAN**
**COASTAL SYSTEMS STATION
PANAMA CITY, FLORIDA**



**Table 3-1
List of SWMUs and AOCs**

Corrective Action Management Plan
CSS Panama City, Florida

NIRP SITE NUMBER	SITE NAME	IAS Recommendations		VS/CS Recommendations		RCRA SWMU/AOC NUMBER	RFA Recommendations		Phase 1 RFI Recommendations		Phase 2 RFI
		NFA	VS/CS	NFA/CA	Remedial Measures		NFA	RFI Phase 1	NFA	RFI Phase 2	
1	Landfill A - Original Disposal Area	-	√	√	-	SWMU 1	-	√	-	√	√
2	Landfill B - Burn and Landfill Area	-	√	-	√	SWMU 2	-	√	-	√	√
3	Old Fire Training Area No. 1	-	√	-	√	AOC 1	-	√	-	√	√
4	Underground Oil Contaminated Area	-	√	-	√	AOC 2	-	√	-	√	√
5	Paint Equipment Cleaning Area	-	√	√	-	SWMU 5	-	√	-	√	√
6	Landfill C - Burn and Disposal Area	-	√	√	-	SWMU 3	-	√	-	√	√
7	Landfill D - Filled Gully	√	-	-	-	SWMU 4	-	√	-	√	√
8	Solvent Disposal (Building 40)	-	√	√	-	AOC 3	√	-	-	-	-
-	RCRA Hazardous Waste Storage Area	-	-	-	-	SWMU 6	√	-	-	-	-
-	Wastewater Treatment Facility	-	-	-	-	SWMU 7	√	-	-	-	-
-	Classified Documents Incinerator	-	-	-	-	SWMU 8	-	√	√	-	-
-	Fire Training Area No. 2	-	-	-	-	SWMU 9	-	√	-	√	√
-	Oil/Water Separators	-	-	-	-	SWMU 10	√	-	-	-	√
-	Temporary Hazardous Storage (Paint Shop)	-	-	-	-	SWMU 11	√	-	-	-	-
-	Temporary Hazardous Storage (Building 40)	-	-	-	-	SWMU 12	√	-	-	-	-
-	Building 455 Site	-	-	-	-	-	-	-	-	-	√
Notes:		AOC = Area of Concern CA = Corrective Action IAS = Initial Assessment Study NFA = No Further Action NIRP = Naval Installation Restoration Program				RFA = RCRA Facility Assessment RFI = RCRA Facility Investigation SWMU = Solid Waste Management Unit VS/CS = Verification Study/Confirmation Study RCRA = Resource Conservation and Recovery Act				√ = Corrective Measures have been implemented	

4.0 SUMMARY OF CORRECTIVE ACTION PROGRAM STRATEGY

This section provides an overview of the CAP strategy for CSS Panama City. The proposed duration of tasks and sequence of events are presented in Section 5.0. The decision flow charts presented in Figures 4-1, 4-2, 4-3, and 4-4 summarize the proposed CAMP strategy for CSS Panama City. These decision flow charts were developed based on consideration of the goals and objectives of the RCRA CAP and the CAMP assumptions summarized in Section 2.0.

For the purpose of this CAMP, the SWMUs and AOCs associated with a given stage of the CAP will be defined as a 'Group' (Figures 4-1, 4-2, 4-3, and 4-4). The Groups are designated alphabetically in the order of their occurrence within the corrective action process. Table 4-1 summarizes the designation of these groups within the corrective action process at CSS Panama City. The following paragraphs summarize this corrective action management strategy.

The SWMUs and AOCs associated with the corrective action measures conducted prior to 1987 are included in three Groups: A, B and C. Group A sites are the 12 SWMUs and three AOCs identified by the RFA as sites with suspected releases of hazardous substances. Upon further evaluation of data obtained during the VS/CS, five SWMUs and one AOC were recommended for No Further Action (Group B) and seven SWMUs and two AOCs were recommended for RFIs (Group C). This group, Group C, was the focus of the Phase 1 RFI investigation. Groups A, B, and C SWMUs and AOCs are presented in Table 4-1.

The remainder of the Groups (i.e., the definition of Groups D through H) are based on the results of the Phase 1 RFI. The SWMUs and AOCs associated with corrective action measures are designated as Groups D, E, F, G and H, in the order of their occurrence in the decision flow

NAVY INSTALLATION RESTORATION PROGRAM (NIRP)

RCRA FACILITY ASSESSMENT (RFA)

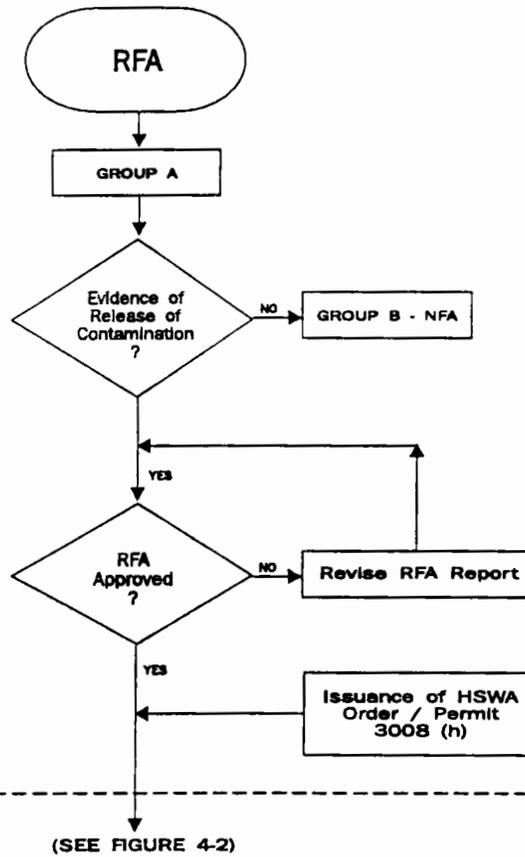


FIGURE 4-1
DECISION FLOW CHART FOR
RFA INVESTIGATIONS

CORRECTIVE ACTION
MANAGEMENT PLAN

COASTAL SYSTEMS STATION
PANAMA CITY, FLORIDA

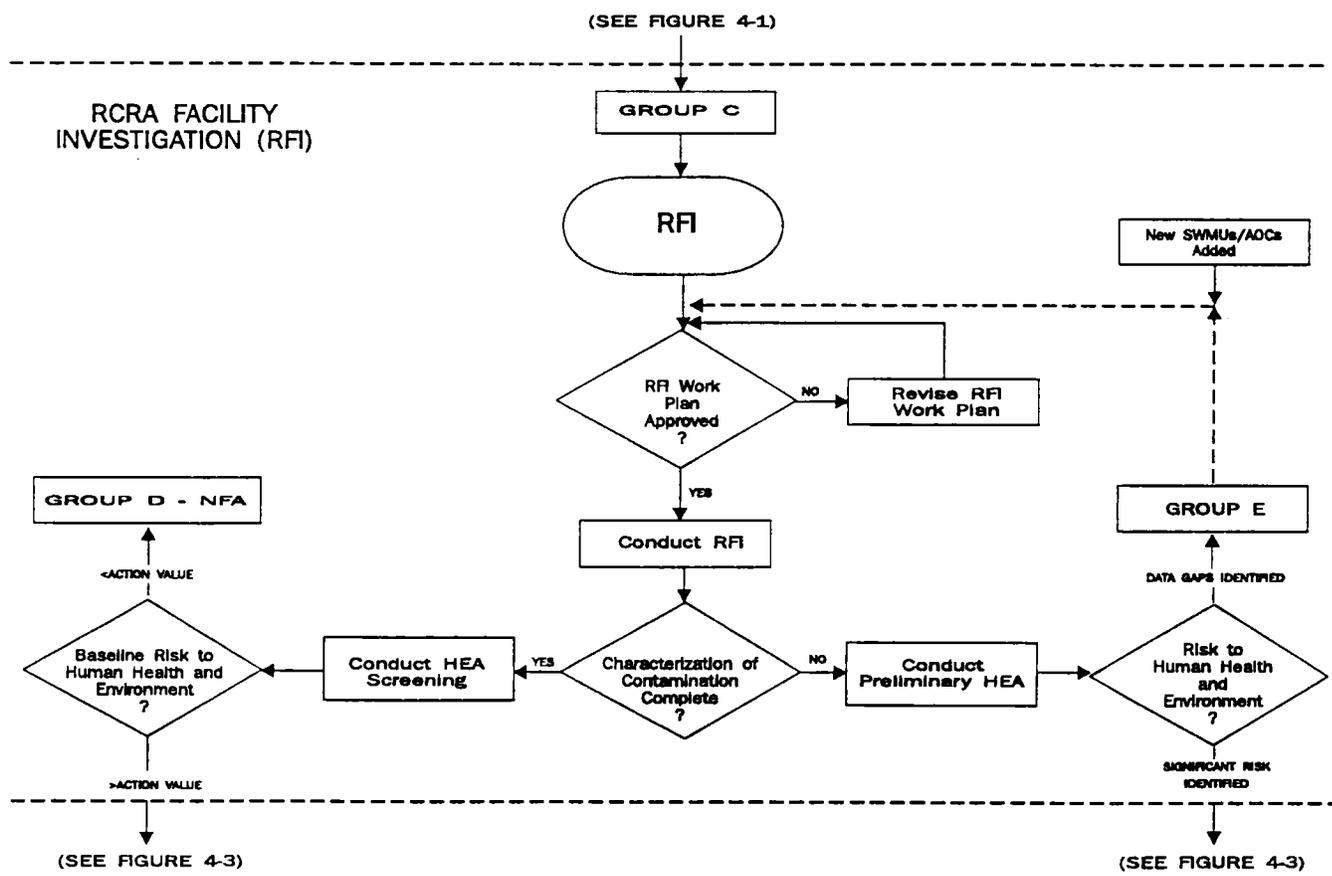


FIGURE 4-2
DECISION FLOW CHART FOR RFI

CORRECTIVE ACTION
MANAGEMENT PLAN

COASTAL SYSTEMS STATION
PANAMA CITY, FLORIDA

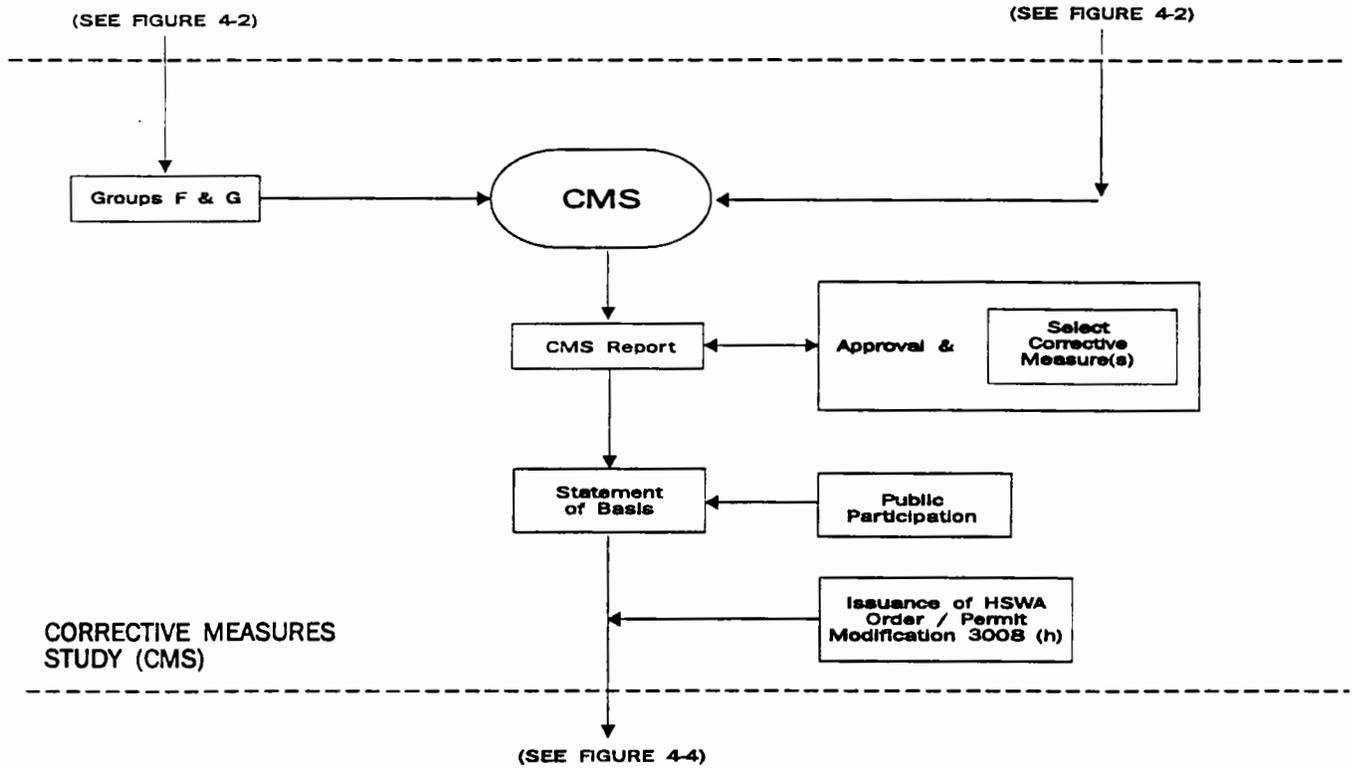


FIGURE 4-3
DECISION FLOW CHART FOR
CMS INVESTIGATIONS

CORRECTIVE ACTION
MANAGEMENT PLAN

COASTAL SYSTEMS STATION
PANAMA CITY, FLORIDA

CORRECTIVE MEASURES
IMPLEMENTATION (CMI)

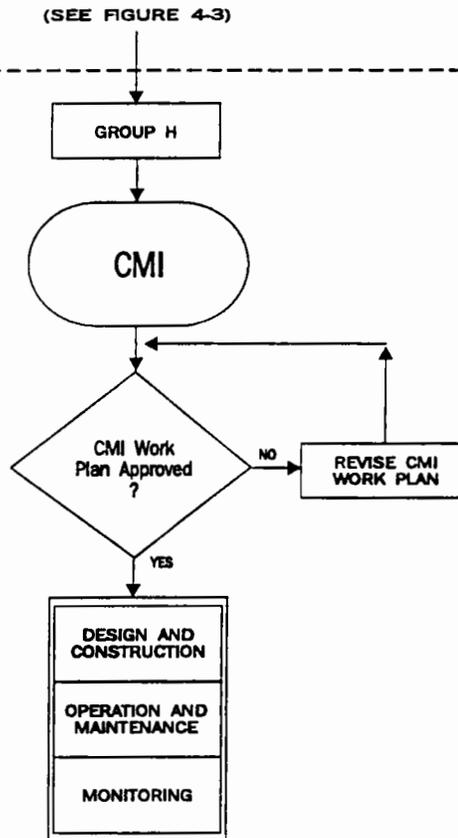


FIGURE 4-4
DECISION FLOW CHART FOR CMI

CORRECTIVE ACTION
MANAGEMENT PLAN
COASTAL SYSTEMS STATION
PANAMA CITY, FLORIDA

**Table 4-1
Decision Chart for Various Phases of Corrective Action Management Plan (CAMP)**

Corrective Action Management Plan
CSS Panama City, Florida

SITE	GROUP A RFA	GROUP B NFA	GROUP C RFI Phase 1	GROUP D NFA	GROUP E RFI Phase 2	GROUP F CMS TM	GROUP G CMS/NFA	GROUP H CMI/NFA
SWMU 1	√	-	√	-	√	-	X	X
SWMU 2	√	-	√	-	√	√	X	X
SWMU 3	√	-	√	-	√	-	X	X
SWMU 4	√	-	√	-	√	-	X	X
SWMU 5	√	-	√	-	√	-	X	X
SWMU 6	√	√	-	-	-	-	-	-
SWMU 7	√	√	-	-	-	-	-	-
SWMU 8	√	-	√	√	-	-	X	X
SWMU 9	√	-	√	-	√	√	X	X
SWMU 10	√	√	-	-	√	-	X	X
SWMU 11	√	√	-	-	-	-	-	-
SWMU 12	√	√	-	-	-	-	-	-
AOC 1	√	-	√	-	√	-	X	X
AOC 2	√	-	√	-	√	-	X	X
AOC 3	√	√	-	-	-	-	-	-
Building 455	-	-	-	-	√	-	X	X
Total	15	6	9	1	10	2	11	11
Notes:	√ = scheduled for corrective measures action. X = decision pending based on the results of the Phase 2 RFI. AOC = Area of Concern CMI = Corrective Measures Implementation CMS = Corrective Measures Study			NFA = No Further Action RFA = RCRA Facility Assessment RFI = RCRA Facility Investigation SWMU = Solid Waste Management Unit TM = Technical Memorandum				

of the CAMP (Figures 4-1, 4-2, 4-3, and 4-4). The five Groups and their associated SWMUs and AOCs are:

Group D

- o SWMUs for which no evidence of contamination is identified and no risk to human health and environment is projected. These SWMUs are recommended for NFA:
 - SWMU 8 - Classified Documents Incinerator

Group E

- o SWMUs and AOCs where evidence of contamination is identified and/or release characterization (determination of vertical and horizontal extent of contamination) is incomplete. These SWMUs and AOCs are recommended for Phase 2 RFI:
 - SWMU 1 - Landfill A, Original Disposal Area
 - SWMU 2 - Landfill B, Burn and Landfill Area
 - SWMU 3 - Landfill C, Burn and Disposal Area
 - SWMU 4 - Landfill D, Filled Gully
 - SWMU 5 - Paint Equipment Cleaning Area
 - SWMU 9 - Fire Training Area No. 2
 - AOC 1 - Old Fire Training Area No. 1
 - AOC 2 - Underground Oil Contaminated Area

- o SWMUs and AOCs that require RFI investigations and are added to the cap at this time:
 - SWMU 10, Oil/water separators
 - Building 455

Group F

- o SWMUs where risk to human health and environment is probable. These SWMUs are recommended for initial CMS activities:
 - SWMU 2 - Landfill B, Burn and Landfill Area
 - SWMU 9 - Fire Training Area No. 2

GROUP G

- SWMUs where, based on the results of the Phase 2 RFI. NFA or CMS activities will be initiated and completed:
 - SWMU 1 - Landfill A, Original Disposal Area
 - SWMU 2 - Landfill B, Burn and Landfill Area
 - SWMU 3 - Landfill C, Burn and Disposal Area
 - SWMU 4 - Landfill D, Filled Gully
 - SWMU 5 - Paint Equipment Cleaning Area
 - SWMU 8 - Classified Documents Incinerator
 - SWMU 9 - Fire Training Area No. 2
 - SWMU 10 - Oil/Water Separators
 - AOC 1 - Old Fire Training Area No. 1
 - AOC 2 - Underground Oil Contaminated Area
 - Building 455 Site

GROUP H

- SWMUs and AOCs where, once the CMS is completed, the CMI phase will be initiated.

5.0 SCHEDULE OF IMPLEMENTATION

The CAP at CSS Panama City will be implemented in stages based on the need for corrective action at each SWMU or AOC. At this time, it is anticipated that the following sequence of corrective actions will occur:

Stage 1.

- o Implementation of initial CMS activities at SWMU 2 and SWMU 9.
- o Completion of the RFI for CSS Panama City including implementation of the Phase 2 RFI field investigation at SWMU 1, SWMU 2, SWMU 3, SWMU 4, SWMU 5, SWMU 9, SWMU 10, AOC 1, AOC 2, and the Building 455 site.

Stage 2.

- o Completion of CMS or NFA activities at SWMU 2, SWMU 4, and SWMU 9 based on the results of the Phase 2 RFI field investigation and the assessment of risk to human health and the environment.
- o Completion of NFA activities at SWMU 8.

Stage 3.

- o Implementation of CMS and/or NFA activities at SWMU 1, SWMU 3, SWMU 5, SWMU 10, AOC 1, AOC 2, and the Building 455 site.

Stage 4.

- o Implementation of CMI activities for SWMUs or AOCs requiring corrective action. As a part of these activities, the Navy will prepare a Corrective Action Program Plan. This plan will document the overall management plan, the responsibility and authority of all parties, the roles and qualifications of key personnel, and the plan for community relations.
- o Monitoring SWMUs and AOCs where CMI is completed.

Table 5-1 presents the implementation schedule for the activities within these stages.

**Table 5-1
Implementation Schedule**

Corrective Action Management Plan
CSS Panama City, Florida

NO.	GROUP	DESCRIPTION	START DATE	SUBMITTAL DATE	DURATION (in days)
1	E	Revise and Submit Chapter 7.0 of the Phase 1 RFI Report/Phase 2 RFI Work Plan	02/22/93	05/28/93	96
2	E	Regulatory Agency Review of Chapter 7.0 of the Phase 1 RFI Report/Phase 2 RFI Work Plan	06/01/93	07/16/93	46
3	E	Revise and Submit Final Phase 1 RFI Report	07/19/93	08/06/93	19
4	E	Conduct Phase 2 RFI Field Program	08/23/93	10/29/93	68
5	F	Prepare and Submit Draft CMS Technical Memorandum	05/17/93	08/13/93	89
6	F	Review Draft CMS Technical Memorandum	08/16/93	08/27/93	12
7	F	Revise and Submit Final CMS Technical Memorandum	08/30/93	09/17/93	19
8	E	Prepare and Submit Draft Phase 2 RFI Report	04/01/94	10/31/94	153
9	E	Regulatory Agency and Navy Review Draft Phase 2 RFI Report	11/01/94	01/03/95	64
10	E	Revise and Submit Final Phase 2 RFI Report	01/04/95	02/03/95	26
11	G	Prepare and Submit Draft CMS/NFA Report for SWMUs 2, 4, 8, and 9	02/06/95	03/31/95	54
12	G	Regulatory Agency and Navy Review Draft CMS/NFA Report for SWMUs 2, 4, 8, and 9	04/03/95	06/02/95	61
13	G	Revise and Submit Final CMS/NFA Report for SWMUs 2, 4, 8, and 9	06/05/95	06/30/95	26
14	G	Prepare and Submit Draft Statement of Basis for SWMUs 2, 4, 8, and 9	06/30/95	09/08/95	70
15	G	Regulatory Agency and Navy Review Draft Statement of Basis for SWMUs 2, 4, 8, and 9	09/11/95	11/10/95	61
16	G	Revise and Submit Final Draft Statement of Basis for SWMUs 2, 4, 8, and 9	11/13/95	12/08/95	26
17	G	Public Comment Period for Final Draft Statement of Basis for SWMUs 2, 4, 8, and 9	12/11/95	01/26/96	47
18	G	Revise and Submit Final Statement of Basis for SWMUs 2, 4, 8, and 9	01/29/96	02/22/96	25
19	G	Prepare and Submit Draft CMS/NFA Report for SWMUs 1, 3, 5, 10, AOCs 1, 2 and the Building 455 site	02/06/95	04/01/96	420
20	G	Regulatory Agency and Navy Review Draft CMS/NFA Report for SWMUs 1, 3, 5, 10, AOCs 1, 2 and the Building 455 site	04/02/96	06/03/96	63
21	G	Revise and Submit Final CMS/NFA Report for SWMUs 1, 3, 5, 10, AOCs 1, 2 and the Building 455 site	06/04/96	07/01/96	28
22	G	Prepare and Submit Draft Statement of Basis for SWMUs 1, 3, 5, 10, AOCs 1, 2 and the Building 455 site	06/04/96	07/15/96	41
23	G	Regulatory Agency and Navy Review Draft Statement of Basis for SWMUs 1, 3, 5, 10, AOCs 1, 2 and the Building 455 site	07/16/96	09/16/96	63

**Table 5-1
Implementation Schedule**

Corrective Action Management Plan
CSS Panama City, Florida

NO.	GROUP	DESCRIPTION	START DATE	SUBMITTAL DATE	DURATION (in days)
24	G	Revise and Submit Final Draft Statement of Basis for SWMUs 1, 3, 5, 10, AOCs 1, 2 and the Building 455 site	09/17/96	10/11/96	25
25	G	Public Comment Period for Final Draft Statement of Basis for SWMUs 1, 3, 5, 10, AOCs 1, 2 and the Building 455 site	10/14/96	11/29/96	47
26	G	Revise and Submit Final Statement of Basis for SWMUs 1, 3, 5, 10, AOCs 1, 2 and the Building 455 site	12/02/96	12/27/96	26
27	G	RCRA Part B Permit Modification	12/30/96	04/10/97	103
28	H	Prepare and Submit Draft Corrective Action Program Plans	02/23/96	05/19/97	452
29	H	Regulatory Agency and Navy Review Draft Corrective Action Program Plans	05/20/97	07/25/97	67
30	H	Revise and Submit Final Corrective Action Program Plans	07/28/97	09/26/97	61
31	H	Prepare and Submit CMI Preliminary Design (30 %)	09/29/97	01/22/98	116
32	H	Regulatory Agency Reviews CMI Preliminary Design (30 %)	01/23/98	03/24/98	61
33	H	Prepare and Submit CMI Interim Design (60 %)	03/25/98	07/27/98	125
34	H	Regulatory Agency Reviews CMI Interim Design (60 %)	07/28/98	09/28/98	63
35	H	Prepare and Submit CMI Prefinal Design (95 %)	09/29/98	12/28/98	91
36	H	Regulatory Agency Reviews CMI Prefinal Design (95 %)	12/29/98	03/01/99	63
37	H	Prepare and Submit CMI Final Design	03/02/99	05/03/99	63
38	H	Prepare and Submit CMI Additional Studies Interim Report	05/04/99	08/02/99	91
39	H	Regulatory Agency and Navy Review CMI Additional Studies Interim Report	08/03/99	10/04/99	63
40	H	Prepare and Submit Draft CMI Additional Studies Final Report	10/05/99	11/08/99	35
41	H	Review Draft CMI Additional Studies Final Report	11/09/99	12/06/99	28
42	H	Revise and Submit CMI Additional Studies Final Report	12/07/99	01/03/00	26
43	H	Prepare and Submit Draft Construction Quality Assurance Plan	01/04/00	04/03/00	91
44	H	Regulatory Agency Reviews Draft Construction Quality Assurance Plan	04/04/00	06/02/00	60
45	H	Revise and Submit Final Construction Quality Assurance Plan	06/05/00	09/01/00	89
46	H	Implement CMI Construction Program	09/04/00	03/02/01	180
47	H	Prepare and Submit CMI Prefinal Inspection Report	03/05/01	04/06/01	33
48	H	Prepare and Submit Draft CMI Report	04/09/01	07/06/01	89
49	H	Regulatory Agency Reviews Draft CMI Report	07/09/01	09/06/01	60
50	H	Complete Construction	09/07/01	10/09/01	33
51	H	Revise and Submit Final CMI Report	10/10/01	01/07/02	90

REFERENCES

- ABB Environmental Services, Inc., 1992. "RCRA Facility Investigation, Coastal Systems Station, Panama City, Florida"; Tallahassee, Florida; June 1992.
- C. C. Johnson and Associates, Inc. (Johnson and Associates), 1985. "Initial Assessment Study, Naval Coastal System Center (NCSC), Panama City, Florida"; Navy Installation Restoration Program (NIRP), NEESA 13-094, Port Hueneme, California; 1985.
- E.C. Jordan Co. (Jordan), 1987. "RCRA Facility Assessment Report, Naval Coastal System Center, Panama City, Florida"; Portland, Maine; 1987.
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- Environmental Science and Engineering, 1987. "Confirmation Study/Verification Study, Naval Coastal Systems Center, Panama City, Florida"; Tampa, Florida; May 1987.
- U.S. Environmental Protection Agency (USEPA), 1985. "Hazardous and Solid Waste Amendments, Permit No. FL8 170 002 792 for Naval Coastal System Center Panama City, Florida, USEPA, Region IV"; Atlanta, Georgia; December 6, 1985.
- U.S. Environmental Protection Agency (USEPA), Region IV, 1985. "Issuance of RCRA Permit for 1984 HWSA"; Atlanta, Georgia; December, 1985.
- U.S. Environmental Protection Agency (USEPA), 1988. "RCRA Corrective Action Plan, Interim Final"; EPA/530-SW-88-028; Solid Waste and Emergency Response (OS-305); Cincinnati, Ohio; 1988.
- U.S. Environmental Protection Agency (USEPA), 1989. "RCRA Facility Investigation (RFI) Guidance, Interim Final"; Office of Solid Waste; OSWER Directive No. 9502-00-6D; Washington, DC; 1989.
- U.S. Environmental Protection Agency (USEPA), 1989. "Corrective Action for Solid Waste Management Units at Hazardous Waste Management Facilities, Proposed Rule"; Federal Register, Vol. 55, No. 145; July 27, 1990.
- U.S. Environmental Protection Agency (USEPA), 1991. "Guidance on RCRA Corrective Action Decision Documents: The Statement of Basis Final Decision and Response to Comments"; EPA/540/G-91/011; Washington, D.C; February, 1991.

APPENDIX A

COASTAL SYSTEMS STATION, PANAMA CITY
RCRA PERMIT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DEC 6 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-RM

Mr. Aturo McDonald
Department of the Navy
Naval Coastal Systems Center
Highway 98
Panama City, Florida 32407

Re: Issuance of RCRA Permit for 1984 HSWA
U. S. Naval Coastal Systems
EPA I. D. NO. FL8 170 002 792

Dear Mr. McDonald:

Enclosed is the Resource Conservation and Recovery Act (RCRA) permit to cover those portions of the 1984 Hazardous and Solid Waste Amendments (HSWA) that affect your facility. This permit, together with the permit issued by the State of Florida on December 2, 1985, constitutes a full RCRA permit.

Issuance of this permit is in accordance with 40 CFR §124.15. The permit is effective December 6, 1985, as no comments were received during the public comment period.

The applicable RCRA regulations in effect at the time of permit issuance and referenced in the permit shall be complied with throughout the life of the permit, unless the permittee requests modification of the permit in response to future amendments of the regulations.

If there are any questions concerning the permit, please contact James H. Scarbrough, of my staff at 404/881-3016.

Sincerely yours,

George L. Harlow

for
Thomas W. Devine, Director
Waste Management Division

cc: Mr. Robert McVety, Florida Department of Environmental
Regulation



DEPARTMENT OF THE NAVY
NAVAL COASTAL SYSTEMS CENTER
PANAMA CITY, FLORIDA 32407-5000

5090
Code 6310/344

0 '9 OCT 1985

Regional Administrator
Environmental Protection Agency, Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

Gentlemen:

Navy Assessment and Control of Installation Pollutants (NACIP) is the Navy's effort to identify and mitigate problems of environmental contamination at shore facilities resulting from the storage, use and disposal of hazardous materials. The Naval Energy and Environmental Support Activity, Port Hueneme, California has completed an Initial Assessment Study for the Naval Coastal Systems Center. We are enclosing a copy of the study for your information. The study identified no areas which pose an imminent threat to public health or the environment.

A Confirmation Study, involving sampling and monitoring, will be conducted by the Southern Division, Naval Facilities Engineering Command, Charleston, S.C. to confirm or deny the presence of the suspected contamination and to quantify the extent of any contamination which may exist. Remedial measures or clean-up operations, if required, will be based on the information developed in the Confirmation Study.

The Initial Assessment Study is also intended to satisfy Condition II.B.1 of the pending EPA RCRA Permit No. FL8170023792.

Naval Coastal Systems Center point of contact is Mr. Arturo McDonald, Code 6310MC, telephone (904) 234-4743.

Sincerely,

C. C. KING
Captain, U.S. Navy
Commanding Officer

Encl:

- (1) Initial Assessment Study of Naval Coastal Systems Center, NEESA 13-084, Sep 1985

Copy to:

- (1) SOUTHNAVFACENGCOM (Code 114) w/o encl.
(2) Naval Energy and Environmental Support Activity (Code 112N) w/o encl.

Statement of Basis

This statement of basis is prepared pursuant to 40 CFR Section 124.7 for the draft permit EPA has written for the Department of Defense, U.S. Naval Cosatal Systems, located in Panama City, Florida. The permit will set conditions for the identification of solid waste management units. Conditions will also be set to verify prior/continuing releases of hazardous waste or hazardous constituents from the solid waste management units. If releases are found, then the permit may be modified for corrective action. The permit will also set conditions for certification of waste minimization.

This permit is being issued based on the requirements of the 1984 Hazardous and Solid Waste Amendments of 1984, Public Law 98-616. These Amendments to the Resource Conservation and Recovery Act (RCRA) have a number of provisions affecting hazardous waste permitting that are immediately effective for any facilities whose RCRA hazardous waste permit had not been issued as of November 8, 1984.

The State of Florida has been granted authorization for those portions of the RCRA Hazardous Waste Program that were in effect prior to the passage of the Hazardous and Solid Waste Amendments of 1984. Until Florida has made the necessary program revisions and received authorization from EPA for the provisions of the 1984 amendments, EPA will administer the requirements of the 1984 amendments. This permit, along with the hazardous waste storage permit being issued by the State of Florida will constitute the full RCRA permit for this facility.

U. S. Department of Defense
U. S. Naval Coastal Systems Center
Panama City, Florida 401-5000

Identification Number FL8 170 023 792
Permit Number FL8 170 023 792

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U. S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to U.S. Department of Defense, U.S. Naval Coastal Systems Center (hereafter called the Permittee), to operate a hazardous waste storage facility located in Panama City, Florida latitude 30° 10' 34" North and longitude 85° 45' 22" West.

This permit, in conjunction with Hazardous Waste Permit to be issued by the State of Florida, constitutes the RCRA permit for this facility. This permit requires the Permittee to determine whether there have been any releases of hazardous waste or hazardous constituents from any solid waste management unit at U.S. Naval Coastal Systems Center, Panama City, Florida regardless of the time at which waste was placed in such unit and to take appropriate corrective action for any such releases. The permit also requires the Permittee to certify annually that on-site generation of hazardous waste is minimized to the extent practical.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and applicable regulations contained in 40 CFR Parts 260 through 264, 270, and 124 as specified in the permit and statutory requirements of RCRA, as amended by the Hazardous and Solid Waste Amendments of 1984, P.L. 98-616, (the RCRA amendments). Applicable regulations are those which are in effect on the date of issuance of this permit in accordance with 40 CFR §270.32(c).

This permit is based on the assumption that the information and reports will be submitted as specified in the permit. Any inaccuracies found in this information may be grounds for termination or modification of this permit in accordance with 40 CFR §§270.41, 270.42 and 270.43 and potential enforcement action. The Permittee must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of December 6, 1985 and shall remain in effect until December 6, 1995 unless revoked and reissued, or terminated under 40 CFR §§270.41 and .43 or continued in accordance with §270.51(a).

12/5/85
Date

George L. Harlow
Signature
for Thomas W. Devine
Director, Waste Management Division

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PART I - STANDARD CONDITIONS

I.A. EFFECT OF PERMIT

Compliance with this permit and the Florida hazardous waste permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought or taken under Section 3013 or Section 7003 of RCRA, Sections 106(a), 104 or 107 of the Comprehensive Environmental Response, Compensation, and Liability Action of 1980 (42 U.S.C. 9601 et seq., commonly known as CERCLA), or any other law providing for protection of public health or the environment.

I.B. PERMIT ACTIONS

This permit may be modified, revoked or reissued, or terminated for cause as specified in 40 CFR §§270.41, 270.42 and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

I.C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

I.D. DUTIES AND REQUIREMENTS

I.D.1. Duty to Comply

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance other than noncompliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

I.D.2. Duty to Reapply

If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.

I.D.3. Permit Expiration

If the state does not have RCRA hazardous waste permitting authority under 40 CFR Part 271 for the 1984 RCRA Amendments, this permit and all conditions herein will remain in effect beyond the permit's expiration date, as specified in §270.51, if the Permittee has submitted a timely, complete application in accordance with §270.10(c) and, through no fault of the Permittee, the Regional Administrator has not issued a new permit with an effective date under §124.15 on or before the expiration date of the previous permit.

If the state does have RCRA hazardous waste permitting authority under 40 CFR Part 271 for the 1984 RCRA Amendments and if the Permittee has submitted a timely and complete application under applicable state law and regulations, the terms and conditions of this permit continue in force beyond the expiration date of the permit, but only until the effective date of the state's issuance or denial of a state RCRA permit.

I.D.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

I.D.5. Duty to Mitigate

In the event of noncompliance with the permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

I.D.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of a backup or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.

I.D.7. Duty to Provide Information

The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for

modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

I.D.8. Inspection and Entry

The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

- I.D.8.a. Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;
- I.D.8.b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- I.D.8.c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- I.D.8.d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

I.D.9. Monitoring and Records.

- I.D.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in the most recent edition of Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 or Standard Methods of Wastewater Analysis.
- I.D.9.b. The Permittee shall retain at the facility records of all monitoring information, including all calibration and maintenance records, records of all data used to prepare documents required by this permit, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record, or until corrective action is completed, whichever date is later. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- I.D.9.c. Records of monitoring information shall specify:
 - I.D.9.c.i. The dates, exact place, and times of sampling or measurements;

- I.D.9.c.ii. The individuals who performed the sampling or measurements;
- I.D.9.c.iii. The dates analyses were performed;
- I.D.9.c.iv. The individuals who performed the analyses;
- I.D.9.c.v. The analytical techniques or methods used; and
- I.D.9.c.vi. The results of such analyses.

I.D.10. Reporting Planned Changes

The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility and to the solid waste management units which are the subjects of the RCRA permit.

I.D.11. Anticipated Noncompliance

The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

I.D.12. Transfer of Permits

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR §270.41(b)(2) or §270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270, the 1984 RCRA Amendments, and this permit.

I.D.13. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

I.D.14. Twenty-four Hour Reporting

The Permittee shall report to the Regional Administrator any noncompliance with this permit resulting from a release from a solid waste management unit which may endanger human health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

- I.D.14.a. Information concerning the release of any hazardous waste or hazardous constituents which may endanger public drinking water supplies.
- I.D.14.b. Information concerning the release or discharge of any hazardous waste or hazardous constituents, or of a fire or explosion

at the facility which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

- I.D.14.b.i. Name, address, and telephone number of the owner or operator;
- I.D.14.b.ii. Name, address, and telephone number of the facility;
- I.D.14.b.iii. Date, time, and type of incident;
- I.D.14.b.iv. Name and quantity of materials involved;
- I.D.14.b.v. The extent of injuries, if any;
- I.D.14.b.vi. An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable and;
- I.D.14.b.vii. Estimated quantity and disposition of recovered material that resulted from the incident.

A written report shall also be provided to the Regional Administrator within 15 days of the time the Permittee becomes aware of the circumstances. The written report shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

I.D. 15. Other Noncompliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above at the time any other reports as required by this permit are submitted. The reports shall contain the information listed in Condition I.D.14.

I.D.16. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts or submitted incorrect information in any document(s) submitted to the Regional Administrator, the Permittee shall promptly submit such facts or information.

I.E. SIGNATORY REQUIREMENT

I.E.1. Certification

All applications, reports, or information submitted to the Regional Administrator shall be signed and certified in accordance with 40 CFR §270.11.

I.F. CONFIDENTIAL INFORMATION

The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR §270.12.

I.G. DEFINITIONS

For purposes of this permit, terms used herein shall have the same meaning as those in RCRA and 40 CFR Parts 124, 260, 261, 264 and 270, unless this permit specifically provides otherwise; where terms are not defined in the regulation, the permit, or EPA guidances or publications, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

- I.G.1. Hazardous constituents for purposes of this permit are those substances listed in 40 CFR Part 261 Appendix VIII and include hazardous constituents released from solid waste and hazardous constituents that are reaction by-products.
- I.G.2. Solid Waste Management Unit for purposes of this permit includes, but is not limited to, any landfill, surface impoundment, waste pile, land treatment unit, incinerator, injection well, tank (including storage, treatment, and accumulation tanks), container storage unit, wastewater treatment unit, elementary neutralization unit, transfer station, and recycling unit from which hazardous constituents might migrate, irrespective of whether the units were intended for the management of solid and/or hazardous wastes.
- I.G.3. Release for purposes of this permit includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment of any hazardous waste or hazardous constituents.
- I.G.4. Contamination for purposes of this permit refers to the presence of any hazardous constituent in a concentration which exceeds the naturally occurring concentration of that constituent in the immediate vicinity of the facility (in areas not affected by the facility).
- I.G.5. Corrective action, for purposes of this permit, may include "corrective action" as provided in 40 CFR §264.100 and/or other remedial activities for any media until otherwise defined in 40 CFR §264.101.

PART II - SOLID WASTE MANAGEMENT UNIT

II.A. ASSESSMENT OF NEED FOR CORRECTIVE ACTION

II.A.1. The Permittee shall provide to the Regional Administrator a report which identifies all solid waste management units currently or previously located at the facility. In preparing this report, the permittee will review all existing sources of information related to solid waste management practices at the facility and fully investigate the facility property to determine the existence of any additional solid waste management units. This report must include, at a minimum, the following information for each unit:

- a) Type of unit
- b) Location of each unit on a topographic map of appropriate scale
- c) General dimensions and capacities
- d) Function of unit
- e) Dates that the unit was operated
- f) Description of the wastes that were placed in the unit
- g) Description of any known releases or spills (to include ground-water data, soil analyses, and/or surface water analyses)

The above report shall be submitted within 90 days of issuance of of this permit.

II.A.2. The Permittee shall prepare a solid waste management unit investigation plan with a proposed schedule for implementation and completion, for each solid waste management unit identified in II.A.1. which are known or suspected to have releases of hazardous waste or hazardous constituents to the environment. The permittee must provide documentation that a release is not probable if a unit is identified which is not included in the solid waste management unit investigation plan.

II.A.3. The Permittee shall include in the solid waste management investigation plan schedules, methods and specific actions as necessary to determine whether a prior or continuing release of hazardous waste or hazardous constituents has occurred, the nature and extent of known or suspected releases and the potential pathways of contaminant releases to the air, land, surface water or groundwater. The results of the investigation shall contain information including, but not limited to, all supporting documentation and data used in implementing the investigation plan.

II.A.4. The Permittee shall implement the solid waste management unit investigation plan(s) in accordance with the schedules contained in each plan upon approval by the Regional Administrator.

II.A.5. The Regional Administrator shall review the final report on the investigation plan(s) and notify the Permittee of the need for further investigative actions and/or the need for corrective action as required under 40 CFR §264.101(a).

II.A.6. Upon such determination the Permittee shall submit to the Regional Administrator a plan which includes the corrective action to be taken at each unit. The proposed corrective action plan shall be submitted in accordance with a schedule to be determined by the Regional Administrator. Corrective action must include a description of the corrective measures to be taken, and a schedule of implementation and completion.

II.A.7. If the Permittee at any time determines that the solid waste management unit investigation plan(s) required under Condition II.A. no longer satisfies the requirements of 40 CFR §264.101 or this permit for prior or continuing releases of hazardous waste or hazardous constituents from solid waste management units, he must submit an amended plan to the Regional Administrator within ninety (90) days of such determination.

II.B. SCHEDULES OF COMPLIANCE

II.B.1. The Permittee shall submit the items required by conditions II.A.1., II.A.2., and II.A.3., and the associated documentation to the Regional Administrator within ninety (90) days of the effective date of this permit.

II.B.2. All plans and schedules shall be subject to approval by the Regional Administrator prior to implementation. The permittee shall revise all submittals as specified by the Regional Administrator.

II.B.3. If the time required to complete any interim activity is more than one year, the schedule shall specify interim dates for the submission of reports of progress toward satisfaction of the interim requirements.

II.B.4. The results of all plans and reports shall be submitted in accordance with the approved schedule. Extensions of the due date for submittals may be granted by the Regional Administrator based on the Permittee's demonstration that sufficient justification for the extension exists.

II.C. PERMIT MODIFICATION

The Permittee shall apply for a permit modification pursuant to 40 CFR §270.41 to incorporate the corrective action plan developed under Condition II.A.6.

PART III - WASTE MINIMIZATION

The following condition is pursuant to 40 CFR §264.73(b)(9):

III.A. WASTE MINIMIZATION CERTIFICATION

The permittee shall be required to certify no less often than annually that the permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the permittee to be economically practicable and the proposed method of treatment, storage or disposal is that practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment.

INFORMATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: NAVAL COASTAL SYSTEMS CENTER
 EPA I. D. NUMBER: FL8170023792
 LOCATION City PANAMA CITY
 State FLORIDA 32407-5000

Facility contact person: Arturo McDonald, Code 6310MC, (904) 234-4743

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART B APPLICATION

	<u>YES</u>	<u>NO</u>
• Landfill	X	
• Surface Impoundment		X
• Land Farm		X
• Waste Pile	X	
• Incinerator	X	
• Storage Tank (Above Ground)	X	
• Storage Tank (Underground)	X	
• Container Storage Area		X
• Injection Wells		X
• Wastewater Treatment Units	X	
• Transfer Stations		X
• Waste Recycling Operations		X

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of each unit. In particular please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volumes of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

WASTEWATER TREATMENT: .2MGD Domestic Sewage Trickling Filter Treatment Plant.

No hazardous wastes/constituents are treated at this facility. Plant is regulated under FDER Permit No. 0003-40851 and NPDES Permit No. FL0002551.

INCINERATOR: 300 lbs/hour Type I incinerator for classified material. Normal operating time is 5 hours per week. No hazardous wastes/constituents (cont. on pag

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

2. (Continued)

are handled at this facility. Incinerator is regulated under FQER Permit No. A003-34959.

STORAGE TANK (ABOVE GROUND): 4,500 gal storage tank for contaminated fuel used for fire training. Approximate usage is 500 gallons per month. There are no hazardous wastes generated at this facility.

STORAGE TANKS (UNDERGROUND): Eight oily waste holding tanks ranging in size from 500 gal to 30,000 gal. Approximate oily waste generation (after separation) is 6,000 gal per year. Hazardous wastes are not treated in these oil separators.

LANDFILLS/WASTE PILES: There are no existing landfills/waste piles at NCSC. A Navy Assessment and Control of Installation Pollutants Initial Assessment Study of past disposal sites was conducted at NCSC from 4 Feb 85 through 8 Feb 85. Seven sites will probably be recommended for confirmation studies. The final report of NCSC's Initial Assessment Study should be ready for release in Aug 85. The list below summarizes these seven past disposal sites:

<u>DESCRIPTION</u>	<u>POSSIBLE POLLUTANTS</u>	<u>DATES OF USE</u>
Original Disposal Area	Paints, thinners, battery acid, solvents, oil	1946 to 1952
Burn and Disposal Area	Similar to above site	1951 to 1953
Burn and Landfill Area	Waste oil, cutting fluid, transformer oil, solvents, red lead paint, bilge wastewater	1955 to late 70's
*Fire Training Area	Paint thinners, paint, diesel fuel, JP-5, gasoline	- to late 70's
*Bulk Petroleum Storage	Diesel fuel, aviation gasoline	1943 to mid 70's
*Underground Oil Spill (South Dock Area)	Diesel fuel	Discovered 1975-76
Waste Paint Disposal Area	Thinners, mineral spirits, paints	- to 1979

**Not a solid waste management unit.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank etc)

There has not been any current releases of hazardous wastes or constituents to the environment at NCSC. Releases that may have occurred in the past from solid waste management sites are presently being evaluated as part of the Initial Assessment Study mentioned in item 2.

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

This data will be generated during the confirmation Phase of the Navy Assessment and Control of Installation Pollutants Program for NCSC. The Confirmation Study will be designed based on the recommendations in the Final Report of the Initial Assessment Study which is expected in August 1985.

Signature and Certification

As with reports in RCRA Permit Applications, submittal of this information must contain the following certification and signature by a principal executive officer of at least the level of Vice President or by a duly authorized representative of that person:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

E. C. Salling
E. C. SALLING, LT, DEC, USN, PWO

Signature

Name and Title (Typed)